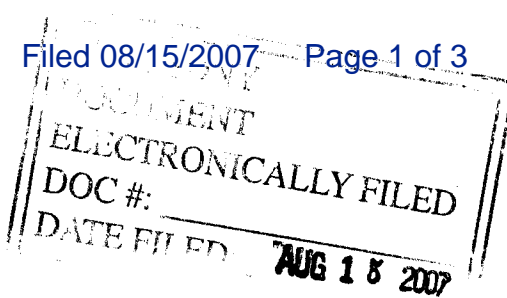


JUDICIAL CASTELUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

:

- v. -

:

VANIA BICALHO-RIVERA and
ANAILDE TROTMAN,

:

:

Defendants.

:

- - - - -x

COUNT ONE

The Grand Jury charges:

1. From at least in or about September 2003, through and including in or about February 2005, in the Southern District of New York and elsewhere, VANEA BICALHO-RIVERA and ANAILDE TROTMAN, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 8, United States Code, Section 1324(a)(2)(B)(ii).

2. It was a part and an object of said conspiracy that VANEA BICALHO-RIVERA and ANAILDE TROTMAN, the defendants, and others known and unknown, unlawfully, willfully, and knowingly, and in reckless disregard of the fact that aliens had not received prior official authorization to come to, enter, and reside in the United States, would and did bring to and attempt to bring to the United States, for the purpose of commercial

advantage and private financial gain, such aliens, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

OVERT ACTS

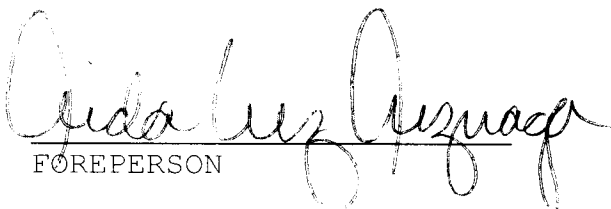
3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 10, 2004, ANAILDE TROTMAN, the defendant, paid for airline flights for at least four aliens from Long Beach, California, to John F. Kennedy Airport in Queens, New York.

b. On or about December 28, 2004, VANEA BICALHO-RIVERA, the defendant, spoke to a cooperating witness in Manhattan, New York, and discussed various options for providing payment for alien smuggling.

c. On or about February 14, 2005, ANAILDE TROTMAN, the defendant, called a cooperating witness in Manhattan, New York, and provided instructions and bank account information for the deposit of a payment for alien smuggling.

(Title 18, United States Code, Section 371.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

VANEA BICALHO-RIVERA and
ANAILDE TROTMAN,

Defendants.

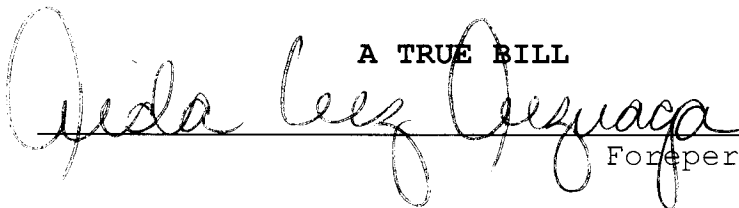
INDICTMENT

07 Cr.

(8 U.S.C. § 371)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

8/15/07 TLC: Post 11/1/87 indictment filed.
A/W ordered. Assigned to Judge Castel.
Pecce, M.J.